

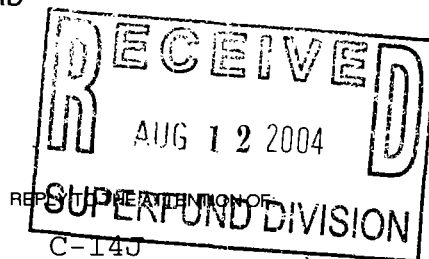


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

AUG 10 2004



EPA Region 5 Records Ctr.



262729

MEMORANDUM

SUBJECT: Citizen Suit Under CERCLA
FROM: *for Allais Johnson*
Jacqueline Miller
Associate Regional Counsel
TO: Richard C. Karl, Acting Director
Superfund Division

The Office of Regional Counsel has received the attached notice for a citizen suit. Please review the notice to determine whether U.S. EPA is taking or intends to take enforcement action at the referenced facility or site and convey your determination to me via memorandum (C-14J) or telephone (886-7167), or to Deloris Johnson, telephone (886-6806). Enforcement action initiated by U.S. EPA at the facility or site prior to sixty days after receipt of the attached notice may preclude the citizen suit.

cc: Bertram Frey
Eric Cohen

Red OK JK 6-28-04

611

UNGARETTI
& HARRIS

CAROL M. DOUGLAS
312.977.4368
cmdouglas@uhlaw.com

June 15, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Ace Hardware Corporation, Reprographics Division
c/o Rita D. Kahle, Registered Agent
2200 Kensington Court
Oak Brook, IL 60523-2100

**RE: Soil/Groundwater Contamination in Downers Grove, Illinois
Notice of Suit CERCLA, RCRA, State Laws
Property Located at 1528 Brook Drive Downers Grove, IL 60515**

Dear Sir or Madam:

This letter gives notice that Tricon Industries, Inc., of Downers Grove, Illinois (hereafter "Tricon") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act, 42 USC §§9601 *et seq.* ("CERCLA"), the Resource Conservation and Recovery Act, 42 USC §§6901 *et seq.* ("RCRA"), and applicable state laws, including violations of state law, and common law causes of action.

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June 15, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Ames Supply Company
c/o Robert C. Hildebrandt, Registered Agent
1936 University Lane, Unit C
Lisle, IL 60532

**RE: Soil/Groundwater Contamination in Downers Grove, Illinois
Notice of Suit CERCLA, RCRA, State Laws
Property Located at 2537 Curtiss Street, Downers Grove, IL 60515**

Dear Sir or Madam:

This letter gives notice that Tricon Industries, Inc., of Downers Grove, Illinois (hereafter "Tricon") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act, 42 USC §§9601 *et seq.* ("CERCLA"), the Resource Conservation and Recovery Act, 42 USC §§6901 *et seq.* ("RCRA"), and applicable state laws, including violations of state law, and common law causes of action.

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June 15, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Arrow Gear Co.
c/o James E. Pielsticker, Registered Agent
2301 Curtiss Street
Downers Grove, IL 60515

**RE: Soil/Groundwater Contamination in Downers Grove, Illinois
Notice of Suit CERCLA, RCRA, State Laws
Property Located at 2301 Curtiss Street, Downers Grove, IL 60515**

Dear Sir or Madam:

This letter gives notice that Tricon Industries, Inc., of Downers Grove, Illinois (hereafter "Tricon") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act, 42 USC §§9601 et seq. ("CERCLA"), the Resource Conservation and Recovery Act, 42 USC §§6901 et seq. ("RCRA"), and applicable state laws, including violations of state law, and common law causes of action.

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June 15, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Atlas Tube Co. (a/k/a Da-Kay Enter.), a Division of J.L. Clark Manufacturing
Company
c/o M.S. Blaylock, Registered Agent
2323 Sixth Street
P.O. Box 7007
Rockford, IL 61125

**RE: Soil/Groundwater Contamination in Downers Grove, Illinois
Notice of Suit CERCLA, RCRA, State Laws
Property Located at 2300 Wisconsin Avenue, Downers Grove, IL 60515**

Dear Sir or Madam:

This letter gives notice that Tricon Industries, Inc., of Downers Grove, Illinois (hereafter "Tricon") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act, 42 USC §§9601 et seq. ("CERCLA"), the Resource Conservation and Recovery Act, 42 USC §§6901 et seq. ("RCRA"), and applicable state laws, including violations of state law, and common law causes of action.

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June 15, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Bales Mold Service, Inc.
c/o Michael J. Bales, Registered Agent
2824 Hitchcock Avenue
Downers Grove, IL 60515

**RE: Soil/Groundwater Contamination in Downers Grove, Illinois
Notice of Suit CERCLA, RCRA, State Laws
Property Located at 2824 Hitchcock Avenue, Downers Grove, IL 60515**

Dear Sir or Madam:

This letter gives notice that Tricon Industries, Inc., of Downers Grove, Illinois (hereafter "Tricon") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act, 42 USC §§9601 *et seq.* ("CERCLA"), the Resource Conservation and Recovery Act, 42 USC §§6901 *et seq.* ("RCRA"), and applicable state laws, including violations of state law, and common law causes of action.

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June 15, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Bison Gear & Eng Corp.
c/o Guy E. Snyder, Registered Agent
222 North LaSalle Street, Suite 2400
Chicago, IL 60601

**RE: Soil/Groundwater Contamination in Downers Grove, Illinois
Notice of Suit CERCLA, RCRA, State Laws
Property Located Ellsworth Industrial Park, Downers Grove, IL 60515**

Dear Sir or Madam:

This letter gives notice that Tricon Industries, Inc., of Downers Grove, Illinois (hereafter "Tricon") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act, 42 USC §§9601 et seq. ("CERCLA"), the Resource Conservation and Recovery Act, 42 USC §§6901 et seq. ("RCRA"), and applicable state laws, including violations of state law, and common law causes of action.

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312.977.4368
cmdouglas@uhlaw.com

June 15, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Bridges Electric, Inc.
c/o Michael E. Irwin, Registered Agent
407 West Searcy Street
Heber Springs, AR 72543

**RE: Soil/Groundwater Contamination in Downers Grove, Illinois
Notice of Suit CERCLA, RCRA, State Laws
Property Located in Ellsworth Industrial Park, Downers Grove, IL 60515**

Dear Sir or Madam:

This letter gives notice that Tricon Industries, Inc., of Downers Grove, Illinois (hereafter "Tricon") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act, 42 USC §§9601 et seq. ("CERCLA"), the Resource Conservation and Recovery Act, 42 USC §§6901 et seq. ("RCRA"), and applicable state laws, including violations of state law, and common law causes of action.

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June 15, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Contemporary Control Systems, Inc.
c/o Thomas J. Sisul, Registered Agent
5120 Main Street, Suite 3
Downers Grove, IL 60515

**RE: Soil/Groundwater Contamination in Downers Grove, Illinois
Notice of Suit CERCLA, RCRA, State Laws
Property Located at 2431 Curtiss Street, Downers Grove, IL 60515**

Dear Sir or Madam:

This letter gives notice that Tricon Industries, Inc., of Downers Grove, Illinois (hereafter "Tricon") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act, 42 USC §§9601 *et seq.* ("CERCLA"), the Resource Conservation and Recovery Act, 42 USC §§6901 *et seq.* ("RCRA"), and applicable state laws, including violations of state law, and common law causes of action.

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June 15, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

CVP Systems, Inc.
c/o Illinois Corporation Service, Registered Agent
801 Adlai Stevenson Drive
Springfield, IL 62703-4261

**RE: Soil/Groundwater Contamination in Downers Grove, Illinois
Notice of Suit CERCLA, RCRA, State Laws
Property Located at 2518 Wisconsin Avenue, Downers Grove, IL 60515**

Dear Sir or Madam:

This letter gives notice that Tricon Industries, Inc., of Downers Grove, Illinois (hereafter "Tricon") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act, 42 USC §§9601 et seq. ("CERCLA"), the Resource Conservation and Recovery Act, 42 USC §§6901 et seq. ("RCRA"), and applicable state laws, including violations of state law, and common law causes of action.

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June 15, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Diamond Power Specialty, Inc.,
c/o C T Corporation System, Registered Agent
208 South LaSalle Street, Suite 814
Chicago, IL 60604-1101

**RE: Soil/Groundwater Contamination in Downers Grove, Illinois
Notice of Suit CERCLA, RCRA, State Laws
Property Located in Ellsworth Industrial Park, Downers Grove, IL 60515**

Dear Sir or Madam:

This letter gives notice that Tricon Industries, Inc., of Downers Grove, Illinois (hereafter "Tricon") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act, 42 USC §§9601 *et seq.* ("CERCLA"), the Resource Conservation and Recovery Act, 42 USC §§6901 *et seq.* ("RCRA"), and applicable state laws, including violations of state law, and common law causes of action.

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June 15, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Dicke Tool
c/o Grant Dicke, Registered Agent
1201 Warren Avenue
Downers Grove, IL 60515

**RE: Soil/Groundwater Contamination in Downers Grove, Illinois
Notice of Suit CERCLA, RCRA, State Laws
Property Located at 1201 Warren Avenue, Downers Grove, IL 60515**

Dear Sir or Madam:

This letter gives notice that Tricon Industries, Inc., of Downers Grove, Illinois (hereafter "Tricon") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act, 42 USC §§9601 *et seq.* ("CERCLA"), the Resource Conservation and Recovery Act, 42 USC §§6901 *et seq.* ("RCRA"), and applicable state laws, including violations of state law, and common law causes of action.

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June 15, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Downers Grove Radiator Service, Inc.
c/o Michael A. Spada, Registered Agent
1513 Ogden Avenue
Downers Grove, IL 60515-2737

**RE: Soil/Groundwater Contamination in Downers Grove, Illinois
Notice of Suit CERCLA, RCRA, State Laws
Property Located at 1517 Ogden Avenue, Downers Grove, IL 60515**

Dear Sir or Madam:

This letter gives notice that Tricon Industries, Inc., of Downers Grove, Illinois (hereafter "Tricon") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act, 42 USC §§9601 *et seq.* ("CERCLA"), the Resource Conservation and Recovery Act, 42 USC §§6901 *et seq.* ("RCRA"), and applicable state laws, including violations of state law, and common law causes of action.

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cmdouglas@uhlhw.com

June 15, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Downers Grove Reporter, Inc.
c/o Chester J. Winter, Jr., Registered Agent
922 Warren Avenue
Downers Grove, IL 60515-3600

**RE: Soil/Groundwater Contamination in Downers Grove, Illinois
Notice of Suit CERCLA, RCRA, State Laws
Property Located at 922 Warren Avenue, Downers Grove, IL 60515**

Dear Sir or Madam:

This letter gives notice that Tricon Industries, Inc., of Downers Grove, Illinois (hereafter "Tricon") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act, 42 USC §§9601 et seq. ("CERCLA"), the Resource Conservation and Recovery Act, 42 USC §§6901 et seq. ("RCRA"), and applicable state laws, including violations of state law, and common law causes of action.

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CAROL M. DOUGLAS
312.977.4368
cmdouglas@uhlaw.com

June 15, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Downers Grove Sanitary District
c/o Lawrence Cox, General Manager, Registered Agent
2710 Curtiss Street
Downers Grove, IL 60515

**RE: Soil/Groundwater Contamination in Downers Grove, Illinois
Notice of Suit CERCLA, RCRA, State Laws
Property Located at 2710 Curtiss Street, Downers Grove, IL 60515**

Dear Sir or Madam:

This letter gives notice that Tricon Industries, Inc., of Downers Grove, Illinois (hereafter "Tricon") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act, 42 USC §§9601 *et seq.* ("CERCLA"), the Resource Conservation and Recovery Act, 42 USC §§9601 *et seq.* ("RCRA"), and applicable state laws, including violations of state law, and common law causes of action.

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June 15, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

DuPage Mfg. Co. (a/k/a DuPage Products Co.), a Division of Precision Brand
Products, Inc.
c/o Raymond Luchetti, Registered Agent
3500 Wolf Road
Franklin Park, IL 60131-1321

**RE: Soil/Groundwater Contamination in Downers Grove, Illinois
Notice of Suit CERCLA, RCRA, State Laws
Property Located at 2250 Curtiss Street, Downers Grove, Illinois 60515**

Dear Sir or Madam:

This letter gives notice that Tricon Industries, Inc., of Downers Grove, Illinois (hereafter "Tricon") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act, 42 USC §§9601 *et seq.* ("CERCLA"), the Resource Conservation and Recovery Act, 42 USC §§6901 *et seq.* ("RCRA"), and applicable state laws, including violations of state law, and common law causes of action.

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June 15, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

DynaGear, Inc.
c/o Robert A. Schuman, Registered Agent
222 South Riverside Plaza, #850
Chicago, IL 60606

**RE: Soil/Groundwater Contamination in Downers Grove, Illinois
Notice of Suit CERCLA, RCRA, State Laws
Property Located at 2500 Curtiss Street, Downers Grove, IL 60515**

Dear Sir or Madam:

This letter gives notice that Tricon Industries, Inc., of Downers Grove, Illinois (hereafter "Tricon") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act, 42 USC §§9601 et seq. ("CERCLA"), the Resource Conservation and Recovery Act, 42 USC §§6901 et seq. ("RCRA"), and applicable state laws, including violations of state law, and common law causes of action.

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June 15, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Elite Electronic Engineering Co.
c/o James C. Klouda, Registered Agent
1516 Centre Circle
Downers Grove, IL 60515

**RE: Soil/Groundwater Contamination in Downers Grove, Illinois
Notice of Suit CERCLA, RCRA, State Laws
Property Located at 1516 Centre Circle, Downers Grove, IL 60515**

Dear Sir or Madam:

This letter gives notice that Tricon Industries, Inc., of Downers Grove, Illinois (hereafter "Tricon") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act, 42 USC §§9601 *et seq.* ("CERCLA"), the Resource Conservation and Recovery Act, 42 USC §§6901 *et seq.* ("RCRA"), and applicable state laws, including violations of state law, and common law causes of action.

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June 15, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Flavorchem
c/o Salvatore R. Sprovieri, Registered Agent
1525 Brook Drive
Downers Grove, IL 60515-1024

**RE: Soil/Groundwater Contamination in Downers Grove, Illinois
Notice of Suit CERCLA, RCRA, State Laws
Property Located at 1525 Brook Drive, Downers Grove, IL 60515**

Dear Sir or Madam:

This letter gives notice that Tricon Industries, Inc., of Downers Grove, Illinois (hereafter "Tricon") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act, 42 USC §§9601 et seq. ("CERCLA"), the Resource Conservation and Recovery Act, 42 USC §§6901 et seq. ("RCRA"), and applicable state laws, including violations of state law, and common law causes of action.

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June 15, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Flexible Steel Lacing Co.
c/o Leroy W. Meyer, Registered Agent
2525 Wisconsin Avenue
Downers Grove, IL 60515

**RE: Soil/Groundwater Contamination in Downers Grove, Illinois
Notice of Suit CERCLA, RCRA, State Laws
Property Located at 2525 Wisconsin Avenue, Downers Grove, IL 60515**

Dear Sir or Madam:

This letter gives notice that Tricon Industries, Inc., of Downers Grove, Illinois (hereafter "Tricon") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act, 42 USC §§9601 *et seq.* ("CERCLA"), the Resource Conservation and Recovery Act, 42 USC §§6901 *et seq.* ("RCRA"), and applicable state laws, including violations of state law, and common law causes of action.

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June 15, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Fusibond, Inc.
c/o Richard H. Krause, Registered Agent
2615 West Curtiss
Downers Grove, IL 60515-4003

**RE: Soil/Groundwater Contamination in Downers Grove, Illinois
Notice of Suit CERCLA, RCRA, State Laws
Property Located at 2615 W. Curtiss, Downers Grove, IL 60515**

Dear Sir or Madam:

This letter gives notice that Tricon Industries, Inc., of Downers Grove, Illinois (hereafter "Tricon") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act, 42 USC §§9601 et seq. ("CERCLA"), the Resource Conservation and Recovery Act, 42 USC §§6901 et seq. ("RCRA"), and applicable state laws, including violations of state law, and common law causes of action.

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June 15, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

General Battery
c/o A. M. Hawkins, Registered Agent
1111 West Long Lake, Suite 300
Troy, MI 48098

**RE: Soil/Groundwater Contamination in Downers Grove, Illinois
Notice of Suit CERCLA, RCRA, State Laws
Property Located at 1516 Brook Drive, Downers Grove, IL 60515**

Dear Sir or Madam:

This letter gives notice that Tricon Industries, Inc., of Downers Grove, Illinois (hereafter "Tricon") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act, 42 USC §§9601 *et seq.* ("CERCLA"), the Resource Conservation and Recovery Act, 42 USC §§6901 *et seq.* ("RCRA"), and applicable state laws, including violations of state law, and common law causes of action.

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June 15, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Graphics Plus
c/o Richard J. Hejna, Registered Agent
1808 Ogden Avenue
Lisle, IL 60532

**RE: Soil/Groundwater Contamination in Downers Grove, Illinois
Notice of Suit CERCLA, RCRA, State Laws
Property Located in Ellsworth Industrial Park, Downers Grove, IL 60515**

Dear Sir or Madam:

This letter gives notice that Tricon Industries, Inc., of Downers Grove, Illinois (hereafter "Tricon") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act, 42 USC §§9601 *et seq.* ("CERCLA"), the Resource Conservation and Recovery Act, 42 USC §§6901 *et seq.* ("RCRA"), and applicable state laws, including violations of state law, and common law causes of action.

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June 15, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Grove Printing, Inc.
c/o Registered Agent, Registered Agent
1247 Warren Street
Downers Grove, IL 60515

**RE: Soil/Groundwater Contamination, in Downers Grove, Illinois
Notice of Suit CERCLA, RCRA, State Laws
Property Located at 1247 Warren Street, Downers Grove, IL 60515**

Dear Sir or Madam:

This letter gives notice that Tricon Industries, Inc., of Downers Grove, Illinois (hereafter "Tricon") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act, 42 USC §§9601 et seq. ("CERCLA"), the Resource Conservation and Recovery Act, 42 USC §§6901 et seq. ("RCRA"), and applicable state laws, including violations of state law, and common law causes of action.

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June 15, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Hollister-Stier Laboratories, Inc.
c/o C T Corporation System, Registered Agent
520 Pike Street
Seattle, WA 98101

**RE: Soil/Groundwater Contamination in Downers Grove, Illinois
Notice of Suit CERCLA, RCRA, State Laws
Property Located at 2201 Curtiss Street, Downers Grove, IL 60515**

Dear Sir or Madam:

This letter gives notice that Tricon Industries, Inc., of Downers Grove, Illinois (hereafter "Tricon") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act, 42 USC §§9601 et seq. ("CERCLA"), the Resource Conservation and Recovery Act, 42 USC §§6901 et seq. ("RCRA"), and applicable state laws, including violations of state law, and common law causes of action.

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June 15, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

International Piping Services Co.
c/o C T Corporation System, Registered Agent
208 South LaSalle Street, Suite 814
Chicago, IL 60604-1101

**RE: Soil/Groundwater Contamination in Downers Grove, Illinois
Notice of Suit CERCLA, RCRA, State Laws
Property Located at 2424 Wisconsin Avenue, Downers Grove, IL 60515**

Dear Sir or Madam:

This letter gives notice that Tricon Industries, Inc., of Downers Grove, Illinois (hereafter "Tricon") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act, 42 USC §§9601 et seq. ("CERCLA"), the Resource Conservation and Recovery Act, 42 USC §§9601 et seq. ("RCRA"), and applicable state laws, including violations of state law, and common law causes of action.

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June 15, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Johnson Printers
c/o Willis G. Johnson, Registered Agent
2659 Wisconsin Avenue
Downers Grove, IL 60515

**RE: Soil/Groundwater Contamination in Downers Grove, Illinois
Notice of Suit CERCLA, RCRA, State Laws
Property Located at 2659 Wisconsin Avenue, Downers Grove, IL 60515-4244**

Dear Sir or Madam:

This letter gives notice that Tricon Industries, Inc., of Downers Grove, Illinois (hereafter "Tricon") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act, 42 USC §§9601 *et seq.* ("CERCLA"), the Resource Conservation and Recovery Act, 42 USC §§6901 *et seq.* ("RCRA"), and applicable state laws, including violations of state law, and common law causes of action.

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UNGARETTI & HARRIS

CAROL M. DOUGLAS
312.977.4368
cmdouglas@uhlslaw.com

June 15, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Johnson Printers
c/o Willis G. Johnson, Registered Agent
603 Rogers Street
Downers Grove, IL 60515

**RE: Soil/Groundwater Contamination in Downers Grove, Illinois
Notice of Suit CERCLA, RCRA, State Laws
Property Located at 2659 Wisconsin Avenue, Downers Grove, IL 60515-4244**

Dear Sir or Madam:

This letter gives notice that Tricon Industries, Inc., of Downers Grove, Illinois (hereafter "Tricon") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act, 42 USC §§9601 *et seq.* ("CERCLA"), the Resource Conservation and Recovery Act, 42 USC §§6901 *et seq.* ("RCRA"), and applicable state laws, including violations of state law, and common law causes of action.

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June 15, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Lindy Manufacturing Company
c/o Cathy G. Collins, Registered Agent
6 South 167 Canterbury Court
Naperville, IL 60540

**RE: Soil/Groundwater Contamination in Downers Grove, Illinois
Notice of Suit CERCLA, RCRA, State Laws
Property Located at 5200 Katrine Avenue, Downers Grove, IL 60515**

Dear Sir or Madam:

This letter gives notice that Tricon Industries, Inc., of Downers Grove, Illinois (hereafter "Tricon") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act, 42 USC §§9601 *et seq.* ("CERCLA"), the Resource Conservation and Recovery Act, 42 USC §§6901 *et seq.* ("RCRA"), and applicable state laws, including violations of state law, and common law causes of action.

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June 15, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Lockformer Company / Met-Coil Systems Corporation
c/o Randy Stodola, Registered Agent
711 Ogden Avenue
Lisle, IL 60532

**RE: Soil/Groundwater Contamination in Downers Grove, Illinois
Notice of Suit CERCLA, RCRA, State Laws
Property Located at 711 Ogden Avenue, Lisle, IL 60532-1399**

Dear Sir or Madam:

This letter gives notice that Tricon Industries, Inc., of Downers Grove, Illinois (hereafter "Tricon") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act, 42 USC §§9601 *et seq.* ("CERCLA"), the Resource Conservation and Recovery Act, 42 USC §§6901 *et seq.* ("RCRA"), and applicable state laws, including violations of state law, and common law causes of action.

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June 15, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Lovejoy, Inc.
c/o Thomas R. Brininger, Registered Agent
2655 Wisconsin Avenue
Downers Grove, IL 60515

**RE: Soil/Groundwater Contamination in Downers Grove, Illinois
Notice of Suit CERCLA, RCRA, State Laws
Property Located at 2655 Wisconsin Avenue, Downers Grove, IL 60515**

Dear Sir or Madam:

This letter gives notice that Tricon Industries, Inc., of Downers Grove, Illinois (hereafter "Tricon") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act, 42 USC §§9601 *et seq.* ("CERCLA"), the Resource Conservation and Recovery Act, 42 USC §§6901 *et seq.* ("RCRA"), and applicable state laws, including violations of state law, and common law causes of action.

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June 15, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Magnetrol International Inc.
c/o Judy G. Stevenson, Registered Agent
5300 Belmont Road
Downers Grove, IL 60515-4400

**RE: Soil/Groundwater Contamination in Downers Grove, Illinois
Notice of Suit CERCLA, RCRA, State Laws
Property Located at 5300 Belmont Road, Downers Grove, IL 60515**

Dear Sir or Madam:

This letter gives notice that Tricon Industries, Inc., of Downers Grove, Illinois (hereafter "Tricon") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act, 42 USC §§9601 et seq. ("CERCLA"), the Resource Conservation and Recovery Act, 42 USC §§6901 et seq. ("RCRA"), and applicable state laws, including violations of state law, and common law causes of action.

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June 15, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Maple Grove Automotive, Ltd.
c/o William A. Benson, Registered Agent
2315 Maple Avenue
Downers Grove, IL 60515-4225

**RE: Soil/Groundwater Contamination in Downers Grove, Illinois
Notice of Suit CERCLA, RCRA, State Laws
Property Located at 2315 Maple Avenue, Downers Grove, IL 60515**

Dear Sir or Madam:

This letter gives notice that Tricon Industries, Inc., of Downers Grove, Illinois (hereafter "Tricon") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act, 42 USC §§9601 *et seq.* ("CERCLA"), the Resource Conservation and Recovery Act, 42 USC §§6901 *et seq.* ("RCRA"), and applicable state laws, including violations of state law, and common law causes of action.

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June 15, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Moldtronics, Inc., a/k/a Grayhill Moldtronics, Inc.
c/o C. Andrew Miriani, Registered Agent
40 Shuman Boulevard, Suite 150
Naperville, IL 60563

**RE: Soil/Groundwater Contamination in Downers Grove, Illinois
Notice of Suit CERCLA, RCRA, State Laws
Property Located at 703 Rogers Street, Downers Grove, IL 60515**

Dear Sir or Madam:

This letter gives notice that Tricon Industries, Inc., of Downers Grove, Illinois (hereafter "Tricon") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act, 42 USC §§9601 et seq. ("CERCLA"), the Resource Conservation and Recovery Act, 42 USC §§6901 et seq. ("RCRA"), and applicable state laws, including violations of state law, and common law causes of action.

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June 15, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Molex, Inc.
c/o Kim Rice, Registered Agent
2222 Wellington Court
Lisle, IL 60532

**RE: Soil/Groundwater Contamination in Downers Grove, Illinois
Notice of Suit CERCLA, RCRA, State Laws
Property Located at 5224 Katrine Street, Downers Grove, IL 60515**

Dear Sir or Madam:

This letter gives notice that Tricon Industries, Inc., of Downers Grove, Illinois (hereafter "Tricon") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act, 42 USC §§9601 *et seq.* ("CERCLA"), the Resource Conservation and Recovery Act, 42 USC §§6901 *et seq.* ("RCRA"), and applicable state laws, including violations of state law, and common law causes of action.

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June 15, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Morey Corporation
c/o Richard R. Morey, Registered Agent
100 Morey Drive
Woodridge, IL 60517

**RE: Soil/Groundwater Contamination in Downers Grove, Illinois
Notice of Suit CERCLA, RCRA, State Laws
Property Located in Ellsworth Industrial Park, Downers Grove, IL 60515**

Dear Sir or Madam:

This letter gives notice that Tricon Industries, Inc., of Downers Grove, Illinois (hereafter "Tricon") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act, 42 USC §§9601 et seq. ("CERCLA"), the Resource Conservation and Recovery Act, 42 USC §§6901 et seq. ("RCRA"), and applicable state laws, including violations of state law, and common law causes of action.

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June 15, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Norwood Marking Systems, a/k/a Norwood Marking & Equipment Co., Inc.
c/o Prentice Hall Corporation, Registered Agent
33 North LaSalle Street
Chicago, IL 60602

**RE: Soil/Groundwater Contamination in Downers Grove, Illinois
Notice of Suit CERCLA, RCRA, State Laws
Property Located at 2538 Wisconsin Avenue, Downers Grove, IL 60515**

Dear Sir or Madam:

This letter gives notice that Tricon Industries, Inc., of Downers Grove, Illinois (hereafter "Tricon") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act, 42 USC §§9601 *et seq.* ("CERCLA"), the Resource Conservation and Recovery Act, 42 USC §§6901 *et seq.* ("RCRA"), and applicable state laws, including violations of state law, and common law causes of action.

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June 15, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Packard Instrument Company, Inc.
c/o C T Corporation System, Registered Agent
208 South LaSalle Street, Suite 814
Chicago, IL 60604

**RE: Soil/Groundwater Contamination in Downers Grove, Illinois
Notice of Suit CERCLA, RCRA, State Laws
Property Located at 2200 Warrenville Road, Downers Grove, IL 60615**

Dear Sir or Madam:

This letter gives notice that Tricon Industries, Inc., of Downers Grove, Illinois (hereafter "Tricon") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act, 42 USC §§9601 et seq. ("CERCLA"), the Resource Conservation and Recovery Act, 42 USC §§6901 et seq. ("RCRA"), and applicable state laws, including violations of state law, and common law causes of action.

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June 15, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Precision Brand Products, Inc.
c/o Raymond Luchetti, Registered Agent
3500 Wolf Road
Franklin Park, IL 60131-1321

**RE: Soil/Groundwater Contamination in Downers Grove, Illinois
Notice of Suit CERCLA, RCRA, State Laws
Property Located at 2250 Curtiss Street, Downers Grove, IL 60515**

Dear Sir or Madam:

This letter gives notice that Tricon Industries, Inc., of Downers Grove, Illinois (hereafter "Tricon") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act, 42 USC §§9601 *et seq.* ("CERCLA"), the Resource Conservation and Recovery Act, 42 USC §§6901 *et seq.* ("RCRA"), and applicable state laws, including violations of state law, and common law causes of action.

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June 15, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Principal Mfr. Co.
c/o Norman S. Lynn, Registered Agent
660 LaSalle Place, Suite 3A
Highland Park, IL 60035

**RE: Soil/Groundwater Contamination in Downers Grove, Illinois
Notice of Suit CERCLA, RCRA, State Laws
Property Located at 5400 Janes Street, Downers Grove, IL 60515**

Dear Sir or Madam:

This letter gives notice that Tricon Industries, Inc., of Downers Grove, Illinois (hereafter "Tricon") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act, 42 USC §§9601 *et seq.* ("CERCLA"), the Resource Conservation and Recovery Act, 42 USC §§6901 *et seq.* ("RCRA"), and applicable state laws, including violations of state law, and common law causes of action.

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CAROL M. DOUGLAS
312.977.4368
cmdouglas@uhlaw.com

June 15, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Rexnord Industries, Inc.
c/o C T Corporation System, Registered Agent
208 South LaSalle Street, Suite 814
Chicago, IL 60604

**RE: Soil/Groundwater Contamination in Downers Grove, Illinois
Notice of Suit CERCLA, RCRA, State Laws
Property Located at 2400 Curtiss Street and 2232 Wisconsin Avenue,
Downers Grove, IL 60515**

Dear Sir or Madam:

This letter gives notice that Tricon Industries, Inc., of Downers Grove, Illinois (hereafter "Tricon") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act, 42 USC §§9601 *et seq.* ("CERCLA"), the Resource Conservation and Recovery Act, 42 USC §§6901 *et seq.* ("RCRA"), and applicable state laws, including violations of state law, and common law causes of action.

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Please be advised that pursuant to 42 USC §9609 of CERCLA, Tricon intends to sue you as a potentially responsible party and/or for violations of CERCLA and applicable regulations. Specifically, the above entity or individual is or was the owner or operator of a facility in Ellsworth Industrial Park from which hazardous substances have been released to soils and/or groundwater. At some prior time or presently, the above entity or individual or a predecessor caused or allowed the release of hazardous substances into soils and groundwater at the facility, or otherwise falls within the provisions set forth at Section 107 of CERCLA, 42 USC §9607. The contamination remains and continues to

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June 15, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

RHI Holdings, Inc. / Fairchild Corporation
c/o John L. Flynn, Registered Agent
45025 Aviation Drive, Suite 400
Dulles, VA 20166-7516

**RE: Soil/Groundwater Contamination in Downers Grove, Illinois
Notice of Suit CERCLA, RCRA, State Laws
Property Located at 2400 Curtiss Street and 2232 Wisconsin Avenue,
Downers Grove, IL 60515**

Dear Sir or Madam:

This letter gives notice that Tricon Industries, Inc., of Downers Grove, Illinois (hereafter "Tricon") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act, 42 USC §§9601 *et seq.* ("CERCLA"), the Resource Conservation and Recovery Act, 42 USC §§6901 *et seq.* ("RCRA"), and applicable state laws, including violations of state law, and common law causes of action.

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June 15, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Scot, Inc.
c/o Seth M. Hemming, Registered Agent
30 South Wacker Drive, 29th Floor,
Chicago, IL 60606

**RE: Soil/Groundwater Contamination in Downers Grove, Illinois
Notice of Suit CERCLA, RCRA, State Laws
Property Located at 2525 Curtiss Road, Downers Grove, IL 60515**

Dear Sir or Madam:

This letter gives notice that Tricon Industries, Inc., of Downers Grove, Illinois (hereafter "Tricon") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act, 42 USC §§9601 *et seq.* ("CERCLA"), the Resource Conservation and Recovery Act, 42 USC §§6901 *et seq.* ("RCRA"), and applicable state laws, including violations of state law, and common law causes of action.

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June 15, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

ServiceMaster International Ltd.
c/o E. L. Olsen, Registered Agent
2300 Warrenville Road
Downers Grove, IL 60515

**RE: Soil/Groundwater Contamination in Downers Grove, Illinois
Notice of Suit CERCLA, RCRA, State Laws
Property Located at 2300 Warrenville Road, Downers Grove, IL 60515**

Dear Sir or Madam:

This letter gives notice that Tricon Industries, Inc., of Downers Grove, Illinois (hereafter "Tricon") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act, 42 USC §§9601 *et seq.* ("CERCLA"), the Resource Conservation and Recovery Act, 42 USC §§6901 *et seq.* ("RCRA"), and applicable state laws, including violations of state law, and common law causes of action.

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June 15, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Spannagel Tool & Die
c/o Brian Spannagel, Registered Agent
336 East Walnut Street
Roselle, IL 60172

**RE: Soil/Groundwater Contamination in Downers Grove, Illinois
Notice of Suit CERCLA, RCRA, State Laws
Property Located at 2732 Wisconsin Avenue, Downers Grove, IL 60515**

Dear Sir or Madam:

This letter gives notice that Tricon Industries, Inc., of Downers Grove, Illinois (hereafter "Tricon") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act, 42 USC §§9601 *et seq.* ("CERCLA"), the Resource Conservation and Recovery Act, 42 USC §§6901 *et seq.* ("RCRA"), and applicable state laws, including violations of state law, and common law causes of action.

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June 15, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Vaughan Seed Co.
c/o C T Corporation System, Registered Agent
208 South LaSalle Street, Suite 814
Chicago, IL 60604

**RE: Soil/Groundwater Contamination in Downers Grove, Illinois
Notice of Suit CERCLA, RCRA, State Laws
Property Located at 5300 Katrine Street, Downers Grove, IL 60515**

Dear Sir or Madam:

This letter gives notice that Tricon Industries, Inc., of Downers Grove, Illinois (hereafter "Tricon") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act, 42 USC §§9601 *et seq.* ("CERCLA"), the Resource Conservation and Recovery Act, 42 USC §§6901 *et seq.* ("RCRA"), and applicable state laws, including violations of state law, and common law causes of action.

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June 15, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

White Lake Building Corporation
c/o Richard A. Marvil, Registered Agent
22 West 782 Sycamore Drive
Glen Ellyn, IL 60137

**RE: Soil/Groundwater Contamination in Downers Grove, Illinois
Notice of Suit CERCLA, RCRA, State Laws
Property Located at 2537 Curtiss Street, Downers Grove, IL 60515**

Dear Sir or Madam:

This letter gives notice that Tricon Industries, Inc., of Downers Grove, Illinois (hereafter "Tricon") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act, 42 USC §§9601 et seq. ("CERCLA"), the Resource Conservation and Recovery Act, 42 USC §§6901 et seq. ("RCRA"), and applicable state laws, including violations of state law, and common law causes of action.

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312.977.4368
cmdouglas@uhlraw.com

June 15, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

William Helwig
c/o William Helwig, Registered Agent
8328 Millbrook Drive
Downers Grove, IL 60516

**RE: Soil/Groundwater Contamination in Downers Grove, Illinois
Notice of Suit CERCLA, RCRA, State Laws
Property Located at 5400 S. Janes Avenue, Downers Grove, IL 60515**

Dear Sir or Madam:

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**UNGARETTI
& HARRIS**

**William Helwig
June 15, 2004
Page 2**

Additionally, Tricon may bring an action against you for violation of Section 103(a) of CERCLA, 42 USC §9603(a). You were the person in charge of an onshore facility and have failed to notify the National Response Center of a release of a hazardous substance.

Tricon may bring actions under CERCLA in 60 days and will pursue all applicable remedies and relief available under CERCLA.

Resource Conservation and Recovery Act

Please be advised that pursuant to Section 7002 of RCRA, 42 USC §6972, Tricon intends to sue the above entity and/or individual for violations of RCRA and applicable regulations, and for contributing to conditions which may present an imminent and substantial endangerment to health or the environment. Specifically, the above entity and/or individual is or was the owner or operator of the property or otherwise contributed to the contamination. There may be other hazardous wastes, solid wastes or regulated substances which were also released at your property(ies) which present or may present an imminent and substantial threat to public health and the environment. Hazardous wastes and/or solid wastes and/or regulated substances have not been properly handled, stored, or disposed pursuant to the requirements of RCRA and regulations promulgated thereunder. The hazardous wastes and/or solid wastes and/or regulated substances remain and continue to migrate onto the Tricon property and downstream locations.

Tricon may bring an action pursuant to 42 USC §6972(a)(1)(A) in 60 days; and an action pursuant to 42 USC §6972(a)(1)(B) in 90 days.

State Claims

This notice also serves as your notice of Tricon's demand for removal and ejectment of the above entity's and/or individual's contaminants from Tricon's property. The toxic and dangerous chemicals from the above entity's and/or individual's facility have migrated across property boundaries and are now located in groundwater at Tricon's facility. Tricon hereby demands that, within 10 days, you remove all solvents and other chemicals, compounds which migrated from the above entity's and/or individual's facility. Upon the expiration of this 10-day period, Tricon will pursue state claims, including but not limited

UNGARETTI
& HARRIS


William Helwig
June 15, 2004
Page 3

to negligence, nuisance, trespass, continuing intentional trespass and violation of the Illinois Environmental Protection Act.

Conclusion

The above claims may be combined with other federal or state statutory or regulatory actions, and with other common law actions. If we do not reach settlement with you before the notice periods of 60 and 90 days expire, Tricon Industries, Inc. will bring suit against you in federal court. I have been retained to represent Tricon in this matter. If you have any questions or would like to discuss this matter further, please contact me.

Very truly yours,


Carol M. Douglas

cc: ***Via Certified Mail:***

Hon. Michael Leavitt, Administrator, USEPA
Hon. Bharat Mathur, Acting Regional Administrator, Region 5, USEPA
Hon. John Ashcroft, US Attorney General, U.S. Department of Justice
Hon. Renee Cipriano, Director, IEPA
Hon. Lisa Madigan, Attorney General, State of Illinois
Hon. Rod Blagojevich, Governor, State of Illinois

**Mr. Michael Leavitt, Administrator
United States Environmental Protection Agency
1200 Pennsylvania Avenue, N.W., 1101A
Washington, D.C. 20460**

**Mr. Bharat Mathur
Acting Regional Administrator
United States Environmental Protection Agency
77 West Jackson Boulevard R-19J
Chicago, IL 60604**

**Hon. John Ashcroft
US Attorney General
United States Department of Justice
950 Pennsylvania Avenue, N.W.
Washington, DC 20530**

**Hon. Renee Cipriano, Director
Illinois Environmental Protection Agency
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P.O. Box 19276
Springfield, IL 62794-9276**

**Hon. Lisa Madigan
Attorney General
State of Illinois
100 West Randolph Street
12th Floor
Chicago, IL 60601**

**Hon. Rod Blagojevich
Governor of the State of Illinois
100 West Randolph Street
Suite 15-200
Chicago, IL 60601**